

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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**DECLARATION OF ROBERT T. HAEFELE TRANSMITTING DOCUMENTS AND
EVIDENCE IN OPPOSITION TO THE RENEWED MOTION TO DISMISS OF SAUDI
BINLADIN GROUP**

Robert T. Haefele, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and associated with the law firm Motley Rice LLC. I submit this Declaration to transmit to the Court the following documents and evidence submitted in Opposition to the Renewed Motion to Dismiss of Saudi Binladin Group and referenced in Plaintiffs' Factual Averment.

- Attached as Exhibit 1 is a true and accurate copy of the Articles of Incorporation for Cromwell Corporation filed, June 16, 1993, bates numbered SBG0002430-35;
- Attached as Exhibit 2 is a true and accurate copy of the Amended Articles of Incorporation for Cromwell Corporation filed, June 30, 1993, bates numbered SBG0002436;
- Attached as Exhibit 3 is a true and accurate copy of two U. S. Postal Service Certified Mail Receipts, bates numbered SBG0000012-15. Along with a U.S. Corporation Income Tax Return, dated December 24, 2000, bates numbered SBG0000016-30;
- Attached as Exhibit 4 is a true and accurate copy of Saudi Binladin Group's Written Consent in Lieu of Special Meeting of the Board of Directors of SBG (USA) Inc, dated December 30, 1999, bates numbered SBG0000031;

- Attached as Exhibit 5 is a true and accurate copy of Saudi Binladin Group's IRS payment voucher, form 941, bates numbered SBG0001385;
- Attached as Exhibit 6 is a true and accurate redacted copy of Saudi Binladin Group's Advice of Transfer from SunTrust Bank, bates numbered SBG0002327;
- Attached as Exhibit 7 are a true and accurate excerpts from the deposition of Faud Rihani, taken April 22, 2008;
- Attached as Exhibit 8 is a true and accurate copy of Fuad Rihani's February 16, 2005 email to Jon Roth, bates numbered MEPC000004, produced by the Middle East Policy Council;
- Attached as Exhibit 9 is a true and accurate copy of Fuad Rihani's November 1, 2008 email to Jon Roth, bates numbered MEPC000041, produced by the Middle East Policy Council;
- Attached as Exhibit 10 is a true and accurate copy of Fuad Rihani's November 6, 2008 email to Jon Roth, bates numbered MEPC004224, produced by the Middle East Policy Council;
- Attached as Exhibit 11 is a true and accurate copy of Fuad Rihani's April 22, 1999 letter to Richard Wilson, bates numbered MEPC004712, produced by the Middle East Policy Council;
- Attached as Exhibit 12 is a true and accurate copy of Chas Freeman's January 30, 2003 letter to the participants of, "Teaching About the Arab World and Islam" teacher

workshop, bates numbered MEPC000003, produced by the Middle East Policy Council;

- Attached as Exhibit 13 is a true and accurate copy of Exhibit 3 from the April 22, 2008 deposition of Fuad Rihani, which is a printout from the website of the Middle East Policy Council as it was archived by Google on April 14, 2008;
- Attached as Exhibit 14 is a true and accurate copy of Exhibit 4 from the April 22, 2008 deposition of Fuad Rihani, which is a printout from the website of the Middle East Policy Council as it appeared on October 10, 2006;
- Attached as Exhibit 15 is a true and accurate copy of Exhibit 5 from the April 22, 2008 deposition of Fuad Rihani, which is a printout from the website of the International Road Federation as it appeared on October 10, 2006;
- Attached as Exhibit 16 is a true and accurate copy of Fuad Rihani's August 4, 1995 letter to Gerald Shea, produced by the International Road Educational Foundation;
- Attached as Exhibit 17 is a true and accurate copy of Fuad Rihani's August 29, 1995 letter to Gerald Shea, produced by the International Road Educational Foundation;
- Attached as Exhibit 18 is a true and accurate copy of Richard Robertson's August 7, 1995 letter to Fuad Rihani, produced by the International Road Federation;
- Attached as Exhibit 19 is a true and accurate copy of Fuad Rihani's August 4, 1995 letter to Gerald Shea, produced by the International Road Educational Foundation;

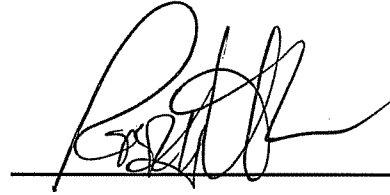
- Attached as Exhibit 20 is a true and accurate copy of Richard Robertson's May 20, 1996 letter to Fuad Rihani, produced by the International Road Federation;
- Attached as Exhibit 21 is a true and accurate copy of International Road Education Foundation's note to the Saudi Binladin Group, dated August 7, 1995, produced by the International Road Federation;
- Attached as Exhibit 22 is a true and accurate copy of International Road Education Foundation's note to the Saudi Binladin Group, dated November 30, 1995, produced by the International Road Federation;
- Attached as Exhibit 23 is a true and accurate copy of Jon Roth's email to Chas Freeman, dated November 7, 2006, bates numbered MEPC003643, produced by the Middle East Policy Council;
- Attached as Exhibit 24 are a true and accurate copy of excerpts from the deposition of Philip Griffin, taken November 15, 2007;
- Attached as Exhibit 25 is a true and accurate copy of excerpts from Defendant Saudi Binladin Group, Inc.'s Supplemental Responses and Objections to Plaintiffs' First Set of Jurisdictional Interrogatories;
- Attached as Exhibit 26 is a true and accurate copy of Yahia Binladin's December 4, 1996 letter to Senator George McGovern, bates numbered MEPC004494, produced by the Middle East Policy Council;

- Attached as Exhibit 27 is a true and accurate copy of Jon Roth's November 8, 2008 email to "SBG", bates numbered MEPC003829, produced by the Middle East Policy Council;
- Exhibit 28 is a true and accurate copy of a fax transmission report, dated March 30, 2004 to Dr. Faud Rihani, produced by the International Road Federation;
- Attached as Exhibit 29 is a true and accurate copy of exhibit 6 from the April 22, 2008 deposition of Fuad Rihani;
- Attached as Exhibit 30 is a true and accurate redacted copy of Saudi Binladin Group's tax filing, bates numbered SBG0000026 (the financial data has been redacted);
- Attached as Exhibit 31 is a true and accurate redacted copy of Ali F. Al Ghamdi's letter dated March 12, 2000 to the Consulate General of USA, bates numbered SBG0002529;
- Attached as Exhibit 32 is a true and accurate redacted copy of Ali F. Al Ghamdi's letter dated October 9, 2000 to the Consulate General of USA, bates numbered SBG0002526;
- Attached as Exhibit 33 is a true and accurate copy of the Guest Folio from the Marriott Hotel, dated March 3, 2001 through March 7, 2001, outlining Abdullah Binladen's stay, bates numbered SBG0002526, and
- Attached as Exhibit 34 is a true and accurate copy of Said Ghachem's fax dated October 29, 1998 to Johann de Villiers, bates numbered SBG0002617.

I declare under penalty of perjury that the foregoing is true and correct, based on my knowledge, information and belief.

Executed on November 18, 2010,

Mount Pleasant, South Carolina

A handwritten signature in black ink, appearing to read 'R. Haefele', is written over a horizontal line.

Robert T. Haefele